

EXHIBIT H

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 ALISON O'DONNELL,

5 Plaintiff,
6 vs.

Case No. 1:16-cv-2450
Judge Donald E. Nugent

7 UNIVERSITY HOSPITALS
8 HEALTH SYSTEM, et al.,

9 Defendants.

10 DEPOSITION OF WILLIAM R. REBELLO
11 Friday, August 18, 2017

12 The deposition of WILLIAM R. REBELLO, a
13 Defendant herein, called for examination by the
14 Plaintiff under the Federal Rules of Civil
15 Procedure, taken before me, Diane M. Stevenson,
16 a Registered Diplomate Reporter, Certified
17 Realtime Reporter, and Notary Public in and for
18 the state of Ohio, pursuant to notice, at The
19 Spitz Law Firm, 25200 Chagrin Blvd., Suite 200,
20 Beachwood, Ohio, commencing at 9:07 a.m., the
21 day and date above set forth.

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23
24
25 Stevenson Reporting Service, Inc.
 2197 Macon Court Westlake, Ohio 44145
 440.892.8600 diane@nls.net

1 create job descriptions for positions not in
2 GME?

3 A. No. We don't create individual job
4 descriptions for each program. We might create
5 a generic job like for a visa that just says
6 what a resident does, in general, what a fellow
7 does, in general, but that is it.

8 Q. Other than Ms. Chester reaching out to you to
9 ask about a job description, did she reach out
09:52 10 to you any additional times regarding
11 Dr. O'Donnell and her complaints?

12 A. Not that I recall.

13 Q. Did she ever speak with you in more detail
14 about her complaints as she communicated them
15 to you?

16 A. I don't recall any conversations with her.

17 Q. Did Julie Chester ever inform you of what steps
18 she was taking to investigate the complaints?

19 A. No, I don't recall her telling me steps, but
09:52 20 that is not unusual.

21 Q. Would that be something that you would not be
22 involved in?

23 A. Correct.

24 Q. Other than passing along the request for a job
25 description to Dr. Uli, did you have any